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United States District Court  
Southern District of Texas  
FILED

JUN 14 2022

Nathan Ochsner, Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

UNITED STATES OF AMERICA

v.

JESSENIA FLORES-SALINAS  
JULIA JUDITH FLORES-SALINAS  
ALYSSA GISELLE VERA

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Criminal No. M-21-2494-S1

**SEALED SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES:**

**Count One**

From or about October 22, 2021 and continuing until on or about December 2, 2021 in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JESSENIA FLORES-SALINAS  
JULIA JUDITH FLORES-SALINAS  
and  
ALYSSA GISELLE VERA**

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

- a. knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the purchase of the properties, both real and personal, which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, a violation of Title 21, knowing that the transaction was designed in whole and in part to conceal and disguise,

the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity, in violation of Title 18 United States Code Section 1956(a)(1)(B)(i) and,

- b. to transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds involving the proceeds of specified unlawful activity, to wit: the distribution of a controlled substance, and offense punishable under Title 21 of the laws of the United States to a place in the United States from or through a place out the United States, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, to wit: the distribution of a controlled substance, with and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i), and,

- c. to transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds involving the proceeds of specified unlawful activity, to wit: the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States to a place in the United States from or through a place outside the United States, knowing that

the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, to wit: the distribution of a controlled substance, with the intent to promote the carrying on of the said specified unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A)(i) and (h).

**Count Two**

On or about October 22, 2021 in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JESSENIA FLORES-SALINAS  
JULIA JUDITH FLORES-SALINAS  
and  
ALYSSA GISELLE VERA**

did attempt to transport monetary funds, that is, approximately \$9,230.00 in United States currency, from a place outside the United States, that is, the United Mexican States, to a place inside the United States, that is, Starr County, Texas with the intent to promote the carrying on of specified unlawful activity, that is, the smuggling of illegal aliens.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

**Count Three**

On or about December 2, 2021, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JESSENIA FLORES-SALINAS  
and  
JULIA JUDITH FLORES-SALINAS**

did attempt to transport monetary funds, that is, approximately \$809,980.00 in United States currency, from a place outside the United States, that is, the United Mexican States, to a place

inside the United States, that is, Starr County, Texas with the intent to promote the carrying on of specified unlawful activity, that is, the distribution of a controlled substance.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

**Count Four**

On or about December 2, 2021, in the Southern District of Texas, and within the jurisdiction of the Court, defendants,

**JESSENIA FLORES-SALINAS  
and  
JULIA JUDITH FLORES-SALINAS**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of \$809,980.00 in United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

**NOTICE OF FORFEITURE  
(18 U.S.C. § 982(a)(1))**

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States gives notice to the Defendants charged in this Indictment that upon conviction of a violation of Title 18, United States Code, Section 1956, including conspiracy, all property, real and personal, involved in such violation, and all property traceable to such property, is subject to forfeiture.

**MONEY JUDGMENT**

Defendants are notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture, for which the Defendants may be jointly and severally liable, and which is at least 10 million dollars.

**PROPERTY SUBJECT TO FORFEITURE**

Defendants are notified that the property subject to forfeiture includes, but is not limited to, the following personal property:

Asset No.	Asset	Description (including VIN or account number)
1	\$9,230.00 in United States currency	Seized on or about October 22, 2021
2	\$809,980.00 in United States currency	Seized on or about December 2, 2021
3	879 Austin Rd. Roma, TX 78584	A ranch-style, single-family residence with a 1-car garage, 2,250 square feet, 4 bedrooms, 2 ½ bathrooms, on a lot of approximately 10,019 sq. ft.
4	Daisy St. Roma, TX 78584	All of Lot Number 4, of Rivera Subdivision, Roma, Starr County, Texas

A TRUE BILL

FOREPERSON

JENNIFER B. LOWERY  
UNITED STATES ATTORNEY

*Patricia Cook Profit*  
ASSISTANT UNITED STATES ATTORNEY